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**Attorneys for Plaintiff
Entropic Communications, LLC**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, et
al.,

Defendants.

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., et al.,

Defendants.

Case No. 2:23-cv-1043-JWH-KES
(Lead Case)

Case No. 2:23-cv-1047-JWH-KES
(Related Case)

Case No. 2:23-cv-1048-JWH-KES
(Related Case)

Case No. 2:23-cv-5253-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

**PLAINTIFF ENTROPIC'S
APPLICATION TO FILE
DOCUMENTS UNDER SEAL
REGARDING MOTION TO
DISMISS COX DEFENDANTS'
COUNTERCLAIMS;
DECLARATION OF CASSIDY T.
YOUNG; [PROPOSED] ORDER**

1 ENTROPIC COMMUNICATIONS, LLC,

2
3 Plaintiff,

4 v.

5 COMCAST CORPORATION, *et al.*,

6
7 Defendants.

8 ENTROPIC COMMUNICATIONS, LLC,

9
10 Plaintiff,

11 v.

12 DIRECTV, LLC, *et al.*,

13
14 Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing **unredacted** information referenced in Entropic’s Motion to Dismiss Cox Defendants’ Counterclaims (“Motion”), which contains details related to and terms of confidential agreements between third parties.

Each portion of the documents referenced in the chart below have been designated as confidential pursuant to agreements reached between third parties or have been filed under seal by Defendants Cox Communications, Inc., CoxCom LLC, and Cox Communications California, LLC (collectively, “Cox”). (*See* Decl. of Cassidy T. Young in Support of Entropic’s Application to File Documents Under Seal, ¶ 4.) Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Motion at 12:4–5.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic’s Motion at 12:5–6.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic’s Motion at 12:7.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic’s Motion at 12:8–12.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic’s Motion at 12:16–17.	Terms of confidential agreement between third parties.
Portions of Entropic’s Motion at 12:19–20.	Terms of confidential agreement between Entropic and a third party.

Portions of Entropic's Motion at 14:3–4.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic's Motion at 14:4–7.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic's Motion at 15:12–13.	Terms of confidential agreement between Cox and a third party.
Portions of Entropic's Motion at 15:14–16.	Terms of confidential agreement between Cox and a third party.
Portions of Entropic's Motion at 20:11–12.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic's Motion at 20:12–14.	Terms of confidential agreement between Entropic and a third party.
Portions of Entropic's Motion at 20:15.	Terms of confidential agreement between Entropic and a third party.
Exhibit A to Declaration of Cassidy T. Young in Support of Motion.	Terms of confidential agreement between Entropic and a third party.
Exhibit B to Declaration of Cassidy T. Young in Support of Motion.	Terms of a confidential agreement between Cox and a third party.
Exhibit C to Declaration of Cassidy T. Young in Support of Motion.	Confidential third-party information.

Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the documents listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a document under seal so long as the Application describes the nature of the information that should be closed to public inspection and is accompanied by: (1) a declaration

1 establishing good cause why the strong presumption of public access in civil cases
 2 should be overcome and informing the Court whether anyone opposes the Application;
 3 (2) a proposed order; (3) a redacted version of the relevant documents; and (4) an
 4 unredacted version of the relevant documents. Entropic has complied with these
 5 requirements. The information that Entropic seeks to seal is contained within
 6 confidential agreements involving third parties or documents containing confidential
 7 third party information. The public does not have an interest in accessing this
 8 confidential information. Additionally, Entropic's request is narrowly tailored to only
 9 prevent the public from viewing confidential information. Finally, counsel for Cox
 10 indicated that it does not oppose Entropic's under seal filing.

11 Therefore, compelling reasons exist to seal the highlighted portions of the above
 12 documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL
 13 1911502, at *5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons
 14 exist to seal references . . . to Defendants' proprietary business records that detail
 15 sensitive financial terms, proprietary business strategies, and confidential negotiations
 16 and agreements with third parties."); *Roberts v. Bloom Energy Corp.*, 2020 WL
 17 6162117, at *4 (N.D. Cal. Oct. 21, 2020) (granting application to seal information
 18 related to confidential third-party agreement).

19 Accordingly, Entropic respectfully requests that this Court order the unredacted
 20 documents to be filed under seal. Concurrent with this filing, Entropic has filed
 21 redacted versions of these documents with the Court, which only redact information
 22 necessary to protect confidential, private, and otherwise non-public information therein.

23 Dated: February 6, 2024

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By: /s/ Cassidy T. Young

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